

Status Conference: January 12, 2017 at 9:00 a.m. (Eastern Time)
Opposition Deadline: TBD

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*Co-Lead Counsel for the Ignition Switch
Plaintiffs and Certain Non-Ignition Switch
Plaintiffs in the MDL Court*

*Designated Counsel for the Ignition Switch
Plaintiffs and Certain Non-Ignition Switch
Plaintiffs in the Bankruptcy Court*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No.: 09-50026 (MG)
f/k/a General Motors Corp., et al.,	:	
	:	
Debtors.	:	(Jointly Administered)
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**NOTICE OF MOTION FOR AN ORDER GRANTING
AUTHORITY TO FILE LATE CLASS PROOFS OF CLAIM**

PLEASE TAKE NOTICE that upon the annexed *Motion For An Order Granting Authority To File Late Class Proofs of Claim*, dated December 22, 2016 (the “**Motion**”) of the Ignition Switch Plaintiffs and Certain Non-Ignition Switch Plaintiffs (collectively, the

“Plaintiffs”),¹ and pursuant to the Court’s *Order to Show Cause Regarding Certain Issues Arising From Lawsuits With Claims Asserted Against General Motors LLC (“New GM”) That Involve Vehicles Manufactured By General Motors Corporation (“Old GM”)*, entered on December 13, 2016 [ECF No. 13802] (the “**OSC**”), a status conference on the Motion will be held before the Honorable Martin Glenn, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **January 12, 2017 at 9:00 a.m. (Eastern Time)** (the “**January 12 Status Conference**”). Pursuant to the OSC, at the January 12 Status Conference the Bankruptcy Court will set a briefing schedule for the Motion, including deadlines for objections and replies.

PLEASE TAKE FURTHER NOTICE that, pursuant to the OSC, any plaintiff wishing to join the Motion shall file a joinder (not to exceed two pages) with the Bankruptcy Court by **no later than January 6, 2017** (the “**Joinder Deadline**”). Failure to join the Motion by the Joinder Deadline by a party purporting to have a claim against the GUC Trust as an Ignition Switch Plaintiff or Non-Ignition Switch Plaintiff may impact such party’s ability to participate in and benefit from the forthcoming proceedings on the Motion and the Late Proof of Claim Issue (as defined in the OSC).

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¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Dated: December 22, 2016
New York, New York

Respectfully submitted,

BROWN RUDNICK LLP

/s/ Edward S. Weisfelner

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